

Before the  
Federal Communications Commission  
Washington, D.C. 20554

ORIGINAL  
FEB 13 2001

In the Matter of

Promoting Efficient Use of Spectrum Through  
Elimination of Barriers to the Development of  
Secondary Markets

To: The Commission

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WT Docket No. 00-230

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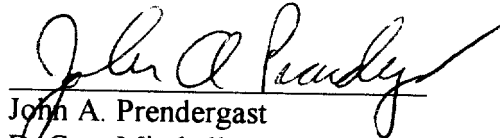
FEB 13 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ERRATUM

The law firm of Blooston, Mordkofsky, Dickens, Duffy and Prendergast, Washington, D.C., hereby submits this erratum to its February 9, 2001 comments in the above-captioned proceeding (FCC 00-402, *released* November 27, 2000), to correct the list of rural telecommunications carriers (the "Blooston Rural Carriers") participating in the comments. A corrected page 1 of the comments, reflecting the participating carriers, is attached hereto.

Respectfully Submitted,



John A. Prendergast

By: Cary Mitchell

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Dated: February 13, 2001

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| Secondary Markets                             | ) |                      |
|   | ) |                      |
| To: The Commission                            | ) |                      |

**COMMENTS OF  
BLOOSTON, MORDKOFKY, DICKENS, DUFFY AND PRENDERGAST**

The law firm of Blooston, Mordkofsky, Dickens, Duffy and Prendergast, Washington, D.C., submits these comments in response to the *Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding (FCC 00-402, *released* November 27, 2000) on behalf of the following rural telecommunications carriers: Golden West Telecommunications Cooperative, Inc. ("Golden West"); Kerrville Telephone Company, Kerrville, Texas ("KTC"); Lincoln County Telephone System, Inc., Pioche, NV ("Lincoln County"); Peñasco Valley Telephone Cooperative, Artesia, NM ("PVT"); Souris River Telecommunications Cooperative (SRT); Sully Buttes Telephone Cooperative, Highmore, SD ("Sully Buttes"); Townes Telecommunications, Inc., Lewisville, AR ("Townes"); and Valley Telecommunications Cooperative Association (Valley) (hereinafter, the "Blooston Rural Carriers").

The Blooston Rural Carriers applaud the efforts of the FCC and, in particular, the Office of Engineering and Technology<sup>1</sup> and the Wireless Telecommunications Bureau,<sup>2</sup> in facilitating industry discussions over the past year regarding spectrum leasing and other secondary market arrangements. These discussions have led the Blooston Rural Carriers (and no doubt many

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<sup>1</sup> See Public Notice "FCC Announces Agenda for Public Forum on Secondary Markets in Radio Spectrum," DA 00-1139, 19 FCC Rcd 18667 (2000).

<sup>2</sup> See Public Notice "Wireless Telecommunications Bureau Seeks Comment on Request for Clarification of De Facto Control Policy and Proposed Spectrum Lease Agreement," DA 00-1953,

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